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July 31, 2023

**Via ECF**

Hon. Victoria Reznik  
United States Magistrate Judge  
Southern District of New York  
300 Quarropas Street  
White Plains, New York 10601

**Re:** File: 00194-Fishman  
Marc Fishman v City of New Rochelle, et al  
Case Number: 19-cv-00265-NSR

Dear Magistrate Judge Reznik:

I represent the plaintiff, Marc Fishman. I submit the following upon request of all parties for the entry of a confidentiality stipulation and protective order.

Pending entry of this proposed order, plaintiff requests the motion to compel be held in abeyance as duly signed HIPPA authorizations cannot be provided until a confidentiality stipulation is so ordered. Plaintiff will also separately oppose the motion to compel on relevancy grounds as the defense had previously conceded plaintiff is disabled and this is nothing short of a fishing expedition.

Respectfully submitted,

A handwritten signature in black ink that reads "Caner Demirayak". The signature is written in a cursive, flowing style.

Caner Demirayak, Esq.

CC: Defense counsel via ECF